

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

UNITED STATES OF AMERICA, ex rel.)	
CAMERON JEHL,)	
)	
Plaintiffs,)	
)	
v.)	No. 3:19-cv-091-NBB-JMV
)	
GGNSC SOUTHAVEN LLC D/B/A GOLDEN)	
LIVINGCENTER-SOUTHAVEN; GGNSC)	
ADMINISTRATIVE SERVICES LLC D/B/A)	
GOLDEN VENTURES; AND GGNSC)	
CLINICAL SERVICES LLC D/B/A GOLDEN)	
CLINICAL SERVICES,)	
)	
Defendants.)	

**RELATOR'S MOTION FOR FOUR DAY EXTENSION TO RESPOND TO
DEFENDANT'S MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

The relator was hoping to respond to the defendants' motion and memo for an award of attorneys' fees and expenses, docket 356-357, within the 14 days provided by the local rules. But as the undersigned continued working on the response late on the night of the 13th day, addressing the request for over two million dollars in fees and expenses and the accompanying 21 exhibits and a 22-page memorandum, he realized that four more days would allow the relator to submit a more thorough response that would better assist the Court in resolving the manifold issues raised by the fee request. Accordingly, the relator respectfully requests an extension from the current due date of Thursday, May 11, 2023, to Monday, May 15, 2023.

The undersigned has emailed counsel for the defendants to determine if they have any objection to this extension. Because of the late hour, they likely will not respond until the morning.

Once they do, the undersigned will submit a supplement to the motion and indicate whether the defendants oppose the motion or not.

Respectfully submitted,

/s/ Robert B. McDuff
Robert B. McDuff (MSB # 2532
Law Office of Robert B. McDuff
767 North Congress Street
Jackson, MS 39202
601.259.8484 (Telephone)
rbm@mcdufflaw.com

Richard R. Barrett (MSB #99108)
Law Office of Richard R. Barrett, PLLC
2086 Old Taylor Road
Suite 1011
Oxford, MS 38655
662.380.5018 (Telephone)
rpb@rrblawfirm.net

Philip N. Elbert (admitted *pro hac vice*)
Kendra E. Samson (admitted *pro hac vice*)
Nathan C. Sanders (admitted *pro hac vice*)
NEAL & HARWELL, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
(615) 244-1713 – Telephone
pelbert@nealharwell.com
ksamson@nealharwell.com
nsanders@nealharwell.com

Counsel for Relator

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May, the foregoing was served on the following counsel by operation of the Court's electronic filing system:

Margaret Sams Gratz, Esq.
Mitchell, McNutt & Sams, P.A.
P. O. Box 7120
Tupelo, MS 38802-7120
mgratz@mitchellmcnutt.com

J. Harland Webster, Assistant U.S. Attorney
Office of the United States Attorney
Northern District of Mississippi
900 Jefferson Avenue
Oxford, MS 38655-3608
joseph.webster@usdoj.gov

Robert Salcido, Esq.
Akin Gump Strauss Hauer & Feld LLP *Counsel for the United States of America*
Robert S. Strauss Tower
2001 K Street NW
Washington, DC 20006-1037
rsalcido@akingump.com

Counsel for Defendants

/s/ Robert B. McDuff _____ -